

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

)	
)	Case No. 10 C 715
)	(Consolidated with:
Trading Technologies International, Inc.,)	10 C 716, 10 C 718,
)	10 C 720, 10 C 721,
Plaintiff,)	10 C 726, 10 C 882,
)	10 C 883, 10 C 884
)	10 C 885, 10 C 929,
v.)	10 C 931)
BGC Partners, Inc., et al.)	
)	Judge Virginia M. Kendall
Defendants.)	
)	
)	

STIPULATED DISMISSAL WITHOUT PREJUDICE

Plaintiff, Trading Technologies International, Inc. (“TT”) and Defendants BGC Partners, Inc., Cantor Fitzgerald, L.P., BGC Holdings, L.P., and BGC Partners, L.P. (“Defendants”) hereby jointly submit a stipulated dismissal removing Defendants from the case. In support of the stipulated dismissal, the parties state as follows:

1. On June 24, 2010, TT filed a Second Amended Complaint against Defendants, alleging infringement of U.S. Patents Nos. 7,587,357, 7,613,651, 7,676,411, and 7,533,056 by certain electronic trading software known as the “eSpeedometer module.”
2. On August 9, 2010, Defendants filed a motion to dismiss the Second Amended Complaint for lack of personal jurisdiction and improper venue.

3. On March 29, 2011, the Court denied Defendants' motion to dismiss without prejudice and granted TT leave to take a Rule 30(b)(6) deposition of Defendants relating to personal jurisdiction.

4. By agreement, in lieu of a Rule 30(b)(6) deposition, Defendants have provided TT a highly confidential sworn declaration (the "Declaration") containing certain representations regarding related entities responsible for the eSpeedometer software and related software. Based on these representations and their agreement to treat discovery requests as if they remained parties to the case, TT is willing to stipulate to dismissal of Defendants without prejudice.

5. The parties have agreed that should discovery lead to evidence contradicting the representations made in the Declaration, Defendants will not oppose a motion by TT for leave to add them back into the case.

6. The parties have agreed that TT may file, simultaneously with the filing of this Stipulated Dismissal, a Third Amended Complaint substituting the related entities named in the Declaration, and that the substituted defendants shall have until June 20, 2011 to answer, move or otherwise respond the Third Amended Complaint, but that the substituted defendants shall not contest personal jurisdiction or venue.

WHEREFORE, the parties jointly respectfully request that this Court enter the stipulated dismissal of Defendants BGC Partners, Inc., Cantor Fitzgerald, L.P., BGC Holdings, L.P., and BGC Partners, L.P.

Respectfully submitted,

Date: May 24, 2011

By: s/ Andrea K. Orth
Leif R. Sigmond, Jr. (ID No. 6204980)
(sigmond@mbhb.com)
Matthew J. Sampson (ID No. 6207606)

(sampson@mbhb.com)
Michael D. Gannon (ID No. 6206940)
(gannon@mbhb.com)
S. Richard Carden (ID No. 6269504)
(carden@mbhb.com)
Jennifer M. Kurcz (ID No. 6279893)
(kurcz@mbhb.com)
Kirsten L. Thomson (ID No. 6293943)
(thomson@mbhb.com)
Andrea Orth (ID No. 6301900)
(orth@mbhb.com)
McDonnell Boehnen Hulbert & Berghoff LLP
300 South Wacker Drive
Chicago, Illinois 60606
Tel.: (312) 913-0001
Fax: (312) 913-0002

Steven F. Borsand (ID No. 6206597)
(Steve.Borsand@tradingtechnologies.com)
Trading Technologies International, Inc.
222 South Riverside
Suite 1100
Chicago, IL 60606
Tel: (312) 476-1000
Fax: (312) 476-1182

**Attorneys for Plaintiff,
TRADING TECHNOLOGIES
INTERNATIONAL, INC.**

By: s/ Andrew M. Johnstone
George C. Lombardi (glombardi@winston.com)
Andrew M. Johnstone (ajohnstone@winston.com)
Winston & Strawn LLP
35 West Wacker Drive
Chicago, Illinois 60601
(312) 558-5600

Gary A. Rosen (grosen@logarpc.com)
Law Offices of Gary A. Rosen, P.C.
1831 Chestnut Street, Seventh Floor
Philadelphia, PA 19103
(215) 972-0600

Attorneys for Defendants BGC Partners, Inc., Cantor Fitzgerald, L.P., BGC Holdings, L.P., and BGC Partners, L.P.

APPROVED AND SO ORDERED: